

1981

CONFERENCE NOTES

PREPERMIT ITEM
Ala

FREEPORT

CLIENT Fish Engineering & Construction SUBJECT Texas Air Control Board Permits
Marine Yard
DATE October 21, 1981 FE&C JOB NO. 2000
PLACE Texas Air Control Board Office NOTES BY L. Hunt
Austin, Texas *esp.*

ATTENDANCE:

Client

Texas Air Control Board (TACB)

S. Crowther

S. Keil

A. Mann

I. Bilsky

FE&C

L. Hunt

R. Whitehead

RECEIVED

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NOV 2 1981

DISTRIBUTION:

Client

Texas Air Control Board

S. Crowther

REGION

TEXAS AIR CONTROL BOARD

FE&C: W/Attachments

G.J. Gill

R.K. Gruenwald

R.J. Heumann

E. Lender

J.R. Nicholson

T. Randolph

P.N. Sicuro

C. Smith

R.T. Whitehead

Action Required By:

The purpose of the meeting was to review the proposed Fish Marine Yard Wash Water Treatment Facility with the TACB and determine any permit requirements.

Items Discussed:

1. The TACB permit requirements do not specifically address barges over water, which falls under the Coast Guard's jurisdiction. The TACB does not generally get involved when there is only oily water or hydrocarbon vapors, but can and will get involved when there are toxic or odorous chemicals which can affect people on shore.
2. Mr. Crowther suggested that Fish check the status of the Grandfather Clause for the facility to see what was Grandfathered as of September 1971. Under this clause the barge cleaning facility can continue to operate exactly the way it did prior to September 1971, with no permit requirements. Any changes made to the September 1971 cleaning facility or operating procedures will require TACB approval.
3. The Wash Water Treatment Facility cannot be exempt from the TACB permit procedures unless the total calculated emissions are less than 25 tons per year. These calculations shall include emissions from the barges during cleaning and gas freeing. After the total emissions have been calculated, Fish can send the calculations and a letter, requesting that this facility be exempt from permit procedures, to the TACB.

CONFERENCE NOTES CONTINUATION

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Action Required By

4. It will take the TACB about four (4) weeks to process the request for exemption. If the total emissions calculated were more than 25 tons per year, the facility would require permits to construct and operate. It would take about four (4) to six (6) months to get the construction permit if required. Bill Stewart, the Executive Director, signs both exemptions and permits if no problems arise.
5. The TACB is interested in the total emissions from the new facility and not the net increase or decrease in emissions. It was pointed out that the ponds create higher emissions than the proposed system and Mr. Crowther stated that even though this would not affect our emissions calculations, it should be pointed out in our letter as it clearly shows an improvement in our operation.
6. The emissions from the boiler should also be included in the calculations.
7. While at the TACB, we reviewed the applications for permit of several barge and tank car cleaning facilities in this area and some of this information has been attached.

T&E 000736

GENERAL PROVISIONS

R-4640

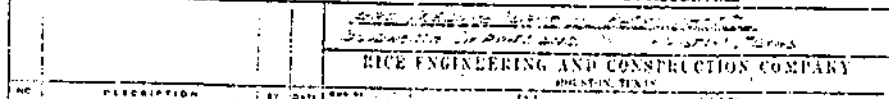
1. Equivalency of Methods - It shall be the responsibility of the holder of this permit to demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the provisions of this permit. Alternative methods shall be applied for in writing and shall be reviewed and approved by the Executive Director prior to their use in fulfilling any requirements of this permit.
2. Sampling Requirements - If sampling of stacks or process vents is required, the holder of this permit must contact the Source Evaluation Section of the Texas Air Control Board prior to sampling to obtain the proper data forms and procedures. The holder of this permit is also responsible for providing sampling facilities and conducting the sampling operations at his own expense.
3. Appeal - This permit may be appealed pursuant to Rule 131.02.07.001 of the Procedural Rules of the Texas Air Control Board and Section 6.01 of the Texas Clean Air Act. Failure to take such appeal constitutes acceptance by the applicant of all terms of the permit.
4. Construction Progress - Start of construction, construction interruptions exceeding 45 days and completion of construction shall be reported to the appropriate regional office of the Texas Air Control Board not later than ten (10) working days after occurrence of the event. This provision shall not apply to operating permits.
5. Record Keeping - Information concerning production, operating hours, fuel type and fuel sulfur content if applicable shall be maintained at the plant site and made available at the request of personnel from the Texas Air Control Board or the local air pollution control agency.

T&E 000737

SPECIAL PROVISIONS

R-4640

1. There shall be no visible emissions from Source No. 4 for more than five minutes in any two-hour period except as provided in §101.11(a) of the General Rules.
2. Volatile organic compounds shall be stored only in tanks venting through Source No. 6.
3. The aggregate concentration of carbon compounds in the vent gases from Source No. 6 and No. 7 shall not exceed a level corresponding to 1.5 psia partial pressure or 45°F dew point, whichever is less.
4. Barge cleaning operations at this facility are limited to the handling of the chemicals appearing on the attached lists or chemicals that are covered by one of the Texas Air Control Board standard exemptions. Barge cleaning and handling of other chemicals is prohibited unless prior approval is obtained from the Executive Director of the Texas Air Control Board. It will not be necessary to obtain reapproval for chemicals previously approved for handling at this facility. A revised chemical product list shall be sent to the Texas Air Control Board promptly when there is any change in the barge cleaning service.
5. The operator of this facility may be required to perform stack sampling and other testing as required by the Executive Director to establish quantities and time pattern of air contaminants being emitted into the atmosphere. Sampling, if required, must be conducted in accordance with appropriate procedures of the Texas Air Control Board Compliance Sampling Manual and in accordance with the applicable EPA Code of Federal Regulation procedures. Any deviations from these procedures must be approved by the Executive Director prior to sampling. The Executive Director or his designated representative shall be afforded the opportunity to observe all such sampling. A copy of all sampling reports shall be furnished to the Executive Director of the Texas Air Control Board within 30 days after completion of sampling.



Newpark Shipbuilding & Repair, Inc.
8502 Cypress Street
Houston, Texas 77012
P.O. Box 5426

Phone: (713) 928-5051

Mr. Kimble Lehman, Marine Chemist
Manager Cleaning Plant

Mr. Harland Miller, Technician I
City of Houston

Acct #HG-0076-G

November 15, 1979

A review of the company file revealed the following violations:

12/13/78	Flare violation 131.03.03.002 Al Chadwick, Investigator	3:00 P.M.
4/2/79	Rule 5 Nuisance by odor 131.01.00.05 Harland Miller, Investigator	
6/19/79	Sandblasting 131.03.04.003(b) Ken Merenda, Investigator	6:30 P.M.
9/21/79	Flare violation 131.03.03.002 Paulo Pinto, Investigator	10:40 P.M.
11/ /79	Rule 5 Nuisance by odor - 131.01.00.05 Greg Grey, Investigator	

TEXAS AIR CONTROL BOARD

3520 SHOAL CREEK BOULEVARD
AUSTIN, TEXAS 78758
512/451-5711

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December 7, 1978

Mr. George E. Matula
Environmental Services
DOW CHEMICAL U.S.A.
Texas Division
Freeport, Texas 77541

Re: Permit Application No. C-6383
Railroad Tankcar Cleaning Facility
Freeport, Brazoria County

Dear Sir:

Section 3.27 of the Clean Air Act delineates that any person who plans to construct a new facility or modify an existing facility which may emit air contaminants shall obtain a construction permit "before any actual work is begun on the facility".

Various inquiries have prompted us to issue guidelines as to what is considered start of construction of a facility. Construction shall be broadly interpreted as anything other than site clearance. All work pertaining to foundations of permit units such as excavation, form erection, or steel laying shall be considered construction. For permit units not requiring a foundation, the erection or construction of any permanent facility such as earthen dams, storage tank fills, or retaining structures shall be considered construction and will not be allowed without prior receipt of the construction permit. Land clearing, leveling of the area, road building, powerline installation, construction shack building, etc., is considered site clearance and/or site preparation.

If you have any questions concerning the meaning of construction for your particular facility, please do not hesitate to contact our office.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bill Stewart".

Bill Stewart, P.E.
Executive Director

T&E 000734

APPROVED CHEMICAL LIST

Acetal
Acetone
Acetonitrile
Amyl Acetate
Amyl Alcohol

Butyl Acetate
Butyl Alcohol
Butyl Ether
Butyl Formate
Butyronitrile

Cellosolves
Cellosolve Acetates
Chlorobenzene
Crude Oil
Crude Oil Condensates
Cyclohexane
Cyclohexene
Cyclopentane
Cyclopentanol
Cyclopentanone
Cyclopentene

Diethyl Ketone
Dipropyl Ketone

Ethyl Acetate
Ethyl Alcohol
Ethyl Benzene
Ethyl Butyrates
Ethyl Cyclohexane
Ethyl Cyclopentane
Ethyl Formate
Ethyl Hexane
Ethyl Methacrylate
Ethyl Pentane
Ethyl Propionate

Gasoline
Gasoline Additives
(non-metallic)

Heptane
Heptene
Hexane
Hexene
Hexanone

Isobutyl Acetate
Isobutyl Alcohol
Isobutyl Isobutyrate
Isohexane
Iso Octane
Isopropyl Acetate
Isopropyl Alcohol
Isopropyl Ether

Mesityl Oxide
Methyl Acetate
Methyl Alcohol
Methyl Amyl Alcohol
Methyl Butyrate
Methyl Cyclohexane
Methyl Cyclopentane
Methyl Ethyl Ketone
Methyl Heptane
Methyl Hexane
Methyl Isoamyl Ketone
Methyl Isobutyl Ketone
Methyl Isopropyl Ketone
Methyl Methacrylate
Methyl Pentane
Methyl Propionate
Methyl Propyl Ketone

Naphtha
Natural Gas Condensate
Nechexane

Octane
Octene

Propyl Acetate
Propyl Alcohol
Propyl Formate
Propyl Propionate

Refinery Petroleum
Products containing
less than 10 percent
benzene

Toluene

Vinyl Acetate
Varsol

Xylene

Additional Chemicals

Benzene
Butadiene
Butyl Aldehyde
Perchloroethylene
Trichloroethylene
Carbon Tetrachloride
Propylaldehyde
Ethyl Aldehyde
Ethylene Dichloride
Propylene
Decanol
Styrene Monomer
Asphalt
Methyl-Butyl Aldehyde